UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

ESTATE OF MIGUEL ROBLES by Maria Montiel as next of kin and surviving spouse of Miguel Robles, and MARIA MONTIEL, Individually,

*

Plaintiffs,

No. 3:11-cy-399

v. *

JURY DEMAND

VANDERBILT UNIVERSITY MEDICAL CENTER, TEJAL BRAHMBHATT, M.D., LAUREN HUBBARD ADCOCK, R.N., and MICHAEL FISCHER, R.R.T.,

*

Defendants.

NOTICE TO TAKE VIDEO DEPOSITION OF DR. STACEY HARMS

TO: Dr. Stacey Harms
c/o Erin Palmer Polly, Esquire
WALKER, TIPPS & MALONE, PLC
2300 One Nashville Place
150 Fourth Avenue, North
Nashville, TN 37219

Please take Notice that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs' counsel will take the video deposition of Dr. Stacey Harms. Said video deposition shall begin at 10:00 a.m. CST on Thursday, September 5, 2013, at Randall, Boxx & Masri, 405 E. Broadway, Monett, Missouri.

This deposition will be conducted upon oral examination before a court reporter and videotaped. This oral examination will continue from day to day until completed.

You are invited to attend and examine.

Respectfully submitted, LAW OFFICES OF MORGAN G. ADAMS

BY: /s/ John W. Chandler, Jr.

JOHN W. CHANLDER, JR., BPR #006219

ATTORNEYS FOR PLAINTIFFS

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CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon the following persons via the electronic filing system or U.S. Mail, postage prepaid, on this 16th day of July, 2013:

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Carthage, MO 64836

/s/John W. Chandler